



U.S. Department of Justice

*United States Attorney
Southern District of New York*

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January 8, 2015

BY ECF

Honorable J. Paul Oetken
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Human Rights Watch v. Dep't of Justice Fed. Bureau of Prisons*, 13 Civ. 7360 (JPO)

Dear Judge Oetken:

I write respectfully on behalf of defendant Federal Bureau of Prisons ("the Government") to request a 30-day extension of the summary judgment briefing schedule in the above-referenced Freedom of Information Act ("FOIA") case.

The Government's motion for summary judgment is currently due January 23, 2015; the plaintiff's opposition and cross-motion are due February 23, 2015; the Government's reply and opposition to the cross-motion are due March 25, 2015; and the plaintiff's reply is due May 10, 2015.

However, I now have a trial set to begin on February 2, 2015, a date that was set after the above-listed summary judgment deadlines were set in this case. Motions *in limine* for the trial beginning on February 2 are due January 9, 2015; oppositions to motions *in limine* are due January 16, 2015; and proposed findings of fact and conclusions of law and direct testimony affidavits are due January 20, 2015. In addition, I will be traveling to Arizona to meet with witnesses from January 11 to 13. Accordingly, the Government respectfully requests a 30-day extension of the summary judgment briefing schedule, with the following new dates:

Government's motion for summary judgment: February 23, 2015

Plaintiff's opposition and cross-motion: March 25, 2015

Government's reply and opposition to plaintiff's cross-motion: April 24, 2015

Plaintiff's reply: May 25, 2015

The Government has made no previous request for an extension of the summary judgment briefing schedule. Plaintiff's counsel consents to the Government's request.

The Government thanks the Court for its consideration of this request.

Respectfully,

PREET BHARARA
United States Attorney

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